IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: EDILBERTO GUZMAN FLORES MARGARITA FONSECA RIVERA DEBTORS	**CASE NO 13-01168/BKT** **CHAPTER 13**

NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN
AND CERTIFICATE OF SERVICE

TO THE HONORABLE COURT:

COME NOW, EDILBERTO GUZMAN FLORES and MARGARITA FONSECA RIVERA, debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray:

1. Debtors are hereby submitting a proposed amended Plan, dated March 26, 2013, herewith and attached to this motion.

2. This proposed amended Plan is filed to cure the objection raised by the Trustee in his report dated March 20, 2013.

WHEREFORE debtors respectfully request the confirmation of the requested amended Plan, dated March 26, 2013.

I CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants and debtors, Edilberto Guzman Flores and Margarita Fonseca Rivera; and to all creditors and parties in interest in the present case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 26th day of March, 2013.

/s/ *Roberto Figueroa Carrasquillo*
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United States Bankruptcy Court
District of Puerto Rico

IN RE:

GUZMAN FLORES, EDILBERTO & FONSECA RIVERA, MARGARITA
Debtor(s)

Case No. 3:13-bk-1168

Chapter 13

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☑ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: ______
☐ PRE ☐ POST-CONFIRMATION

☑ AMENDED PLAN DATED: 3/26/2013
Filed by: ☑ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

$ 150.00	x	47	= $	7,050.00
$ 350.00	x	13	= $	4,550.00
$	x		= $	
$	x		= $	
$	x		= $	

TOTAL: $ 11,600.00

Additional Payments:
$ ______ to be paid as a LUMP SUM within ______ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in addition to the above:
$ ______ x ______ = $ ______

PROPOSED BASE: $ 11,600.00

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: $ 2,851.00

Signed: */s/ EDILBERTO GUZMAN FLORES*
Debtor

/s/ MARGARITA FONSECA RIVERA
Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR ____ $ ______
B. SECURED CLAIMS:
☐ Debtor represents no secured claims.
☑ Creditors having secured claims will retain their liens and shall be paid as follows:
1. ☐ Trustee pays secured ARREARS:

Cr.	Cr.	Cr.
#	#	#
$	$	$

2. ☐ Trustee pays IN FULL Secured Claims:

Cr.	Cr.	Cr.
#	#	#
$	$	$

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr.	Cr.	Cr.
#	#	#
$	$	$

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ Other:

6. ☑ Debtor otherwise maintains regular payments directly to:
FIRST BANK

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)
D. UNSECURED CLAIMS: Plan ☐ Classifies ☑ Does not Classify Claims.
1. (a) Class A: ☐ Co-debtor Claims / ☐ Other:
☐ Paid 100% / ☐ Other:

Cr.	Cr.	Cr.
#	#	#
$	$	$

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (*Executory contracts; payment of interest to unsecureds, etc.*)
Debtor(s) consents to the LIFT of STAY in favor of Reliable, Claim 7 (paid by third party)
Debtor assume residential lease with José A. Alos.
* "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."
Late filed claims filed by creditors will receive no distribution.
"Surrenders collateral": Shares/savings in any Cooperativa/Association/Bank.
Debtor reserves the right to object claims after plan confirmation.

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